

THE URBAN LAW FIRM
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Counsel for Plaintiffs Laborers Joint Trust Funds

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THE BOARD OF TRUSTEES OF THE CONSTRUCTION INDUSTRY AND LABORERS HEALTH AND WELFARE TRUST; THE BOARD OF TRUSTEES OF THE CONSTRUCTION INDUSTRY AND LABORERS JOINT PENSION TRUST; THE BOARD OF TRUSTEES OF THE CONSTRUCTION INDUSTRY AND LABORERS VACATION TRUST; THE BOARD OF TRUSTEES OF SOUTHERN NEVADA LABORERS LOCAL 872 TRAINING TRUST.

CASE NO.: 2:15-cv-00180-APG-VCF

**APPLICATION FOR JUDGMENT
DEBTOR EXAMINATION OF
DEFENDANT/JUDGMENT DEBTOR
CRAIG EHRNREITER, an individual**

Plaintiffs

VS

SAFETY SEALED WATER SYSTEMS
LLC, a Domestic Limited-Liability Company;
CRAIG EHRNREITER, individually; LORA
LEE EHRNREITER, individually; and
SCOTT HEFTY, individually

Defendants.

Plaintiffs BOARD OF TRUSTEES OF THE CONSTRUCTION INDUSTRY AND LABORERS HEALTH AND WELFARE TRUST; BOARD OF TRUSTEES OF THE CONSTRUCTION INDUSTRY AND LABORERS JOINT PENSION TRUST; BOARD OF TRUSTEES OF THE CONSTRUCTION INDUSTRY AND LABORERS VACATION TRUST; AND

1 THE BOARD OF TRUSTEES OF THE SOUTHERN NEVADA LABORERS LOCAL 872
2 TRAINING TRUST, (hereinafter "Plaintiffs"), by and through its attorneys of record, Seth T. Floyd,
3 Esq. of THE URBAN LAW FIRM, and pursuant to Rule 69 of the Federal Rules of Civil Procedure,
4 hereby moves this Court for an Order directing the appearance of Defendant/Judgment Debtor Craig
5 Ehrnreiter, an individual (hereinafter "Mr. Ehrnreiter"), and an Order directing the production of certain
6 documents subject to his ownership and control.

7 This application is supported by the Declaration of Seth T. Floyd and the proposed Order filed
8 herewith.

9 Dated: September 23, 2016

THE URBAN LAW FIRM

10 */s/ Seth T. Floyd*

11 MICHAEL A. URBAN, Nevada State Bar No. 3875
12 NATHAN R. RING, Nevada State Bar No. 12078
13 SETH T. FLOYD, Nevada State Bar No. 11959
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Rule 69 of the Federal Rules of Civil Procedure allows a Judgment Creditor to enforce a
3 judgment through supplementary proceedings, including discovery from the Judgment Debtors.

4 Judgment was entered on September 7, 2016, against Safety Sealed Water Systems LLC, Craig
5 Ehrnreiter, individually, Lora Lee Ehrnreiter, individually and Scott Hefty, individually, in the amount
6 of \$186,452.85. The Clerk of the Court entered the Default Judgment on September 8, 2016.

7 Said judgment has not been vacated or reversed. The current balance due on the judgment is
8 \$186,452.85, exclusive of interest, and it remains owing and unpaid. There is no stay of execution and
9 execution may properly be issued.

10 A judgment debtor examination of Mr. Ehrnreiter is necessary to enable Judgment Creditor to
11 discover the assets, real and personal property, current employment, etc., and any facts relating thereto,
12 which may assist Judgment Debtor in obtaining satisfaction of the Judgment.

13 WHEREFORE, pursuant to FRCP 69, Judgment Creditor respectfully requests that this Court
14 issue an Order scheduling a judgment debtor examination of Judgment Debtor Craig Ehrnreiter.

15
16 DATED: September 23, 2016

THE URBAN LAW FIRM

17 /s/ Seth T. Floyd
18 MICHAEL A. URBAN, Nevada State Bar No. 3875
19 NATHAN R. RING, Nevada State Bar No. 12078
20 SETH T. FLOYD, Nevada State Bar No. 11959
21 *Counsel for Plaintiffs Laborers Joint Trust Funds*

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7 UNITED STATES DISTRICT COURT
8
9

DISTRICT OF NEVADA

10 THE BOARD OF TRUSTEES OF THE
11 CONSTRUCTION INDUSTRY AND
12 LABORERS HEALTH AND WELFARE
13 TRUST; THE BOARD OF TRUSTEES OF
14 THE CONSTRUCTION INDUSTRY AND
15 LABORERS JOINT PENSION TRUST;
16 THE BOARD OF TRUSTEES OF THE
17 CONSTRUCTION INDUSTRY AND
18 LABORERS VACATION TRUST; THE
19 BOARD OF TRUSTEES OF SOUTHERN
20 NEVADA LABORERS LOCAL 872
21 TRAINING TRUST,

22 Plaintiffs,

23 vs.

24 SAFETY SEALED WATER SYSTEMS
25 LLC, a Domestic Limited-Liability
Company; CRAIG EHRNREITER,
26 individually; LORA LEE EHRNREITER,
individually; and SCOTT HEFTY,
individually

27 Defendants.

CASE NO.: 2:15-cv-00180-APG-VCF

DECLARATION OF SETH T. FLOYD IN
SUPPORT OF APPLICATION FOR
JUDGMENT DEBTOR EXAMINATION
OF DEFENDANT/JUDGMENT DEBTOR
CRAIG EHRNREITER, an individual

28 I, SETH T. FLOYD, declare:

29 1. I am a member of the Bar of this Court and attorney of record for the Judgment
Creditors in the above-entitled action.

2. Judgment was entered on September 7, 2016, in the amount of One Hundred Eighty Six Thousand Four Hundred Fifty Two Dollars and Eighty Five Cents (\$186,452.85), in favor of Plaintiffs and against Defendants Safety Sealed Water Systems LLC, Craig Ehrnreiter, individually, Lora Lee Ehrnreiter, individually and Scott Hefty, individually.

3. Said judgment has not been vacated or reversed. The current balance due on the judgment is \$186,452.85, exclusive of interest, remains owing and unpaid. There is no stay of execution and execution may properly be issued.

4. Craig Ehrnreiter (“Mr. Ehrnreiter”) is an individual believed to reside in Las Vegas, Nevada.

5. An Order scheduling an examination of Mr. Ehrnreiter and requiring production of documents by Mr. Ehrnreiter is necessary to pursue collection of the judgment. No prior examination has been conducted.

6. I estimate the time for the examination in this matter will be approximately three hours. The subject of this examination will be the location and identification of all assets of Mr. Ehrnreiter, and all debts and obligations owed to Mr. Ehrnreiter. In addition to the appearance of Mr. Ehrnreiter, the current financial statements and records and recent past financial statements and records of Mr. Ehrnreiter are necessary for a complete examination to be conducted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on September 23, 2016, in Las Vegas, Nevada.

/s/ Seth T. Floyd
SETH T. FLOYD

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12 *Counsel for Plaintiff's Laborers Joint Trust Funds*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 THE BOARD OF TRUSTEES OF THE
16 CONSTRUCTION INDUSTRY AND
17 LABORERS HEALTH AND WELFARE
18 TRUST; THE BOARD OF TRUSTEES OF
19 THE CONSTRUCTION INDUSTRY AND
20 LABORERS JOINT PENSION TRUST; THE
21 BOARD OF TRUSTEES OF THE
22 CONSTRUCTION INDUSTRY AND
23 LABORERS VACATION TRUST; THE
24 BOARD OF TRUSTEES OF SOUTHERN
25 NEVADA LABORERS LOCAL 872
26 TRAINING TRUST,

27 Plaintiffs,

28 vs.

1 SAFETY SEALED WATER SYSTEMS LLC,
2 a Domestic Limited-Liability Company;
3 CRAIG EHRNREITER, individually; LORA
4 LEE EHRNREITER, individually; and SCOTT
5 HEFTY, individually

6 Defendants.

7 CASE NO: 2:15-cv-00180-APG-VCF

8 (Proposed)
9 ORDER FOR JUDGMENT DEBTOR
10 EXAMINATION OF DEFENDANT CRAIG
11 EHRNREITER, an individual

12 Having considered Plaintiffs' Application for Judgment Debtor Examination of
13 Defendant/Judgment Debtor Craig Ehrnreiter, an individual and the Declaration of Seth T. Floyd and
14 good cause appearing,

IT IS HEREBY ORDERED that Defendant/Judgment Debtor Craig Ehrnreiter, appear in
3D Courtroom _____ at the United States District Courthouse for the District of Nevada, located at 333 Las
Vegas Blvd. South, Las Vegas, Nevada 89101, on the _____ day of _____, 201_____, at
10:00 a.m., to be sworn in for a Judgment Debtor Examination.

IT IS FURTHER ORDERED that Defendant/Judgment Debtor Craig Ehrnreiter, appear at The Urban Law Firm, located at 4270 South Decatur Blvd., Suite A-9, Las Vegas, Nevada 89103 on 28th October the _____ day of _____, 201_____, at ____:_____.m., and answer concerning property subject to the ownership and control of Craig Ehrnreiter (hereinafter referred to as "Mr. Ehrnreiter").

IT IS FURTHER ORDERED that Mr. Ehrnreiter brings with him the following documents under his control or under the control of its agents, attorneys or accountants:

- a. All financial statements prepared by or on behalf of Mr. Ehrnreiter from January 1, 2014, to the present.
 - b. All original monthly bank statements of Mr. Ehrnreiter from January 1, 2014, to the present.
 - c. All original savings account pass books, certificates of deposit, and trust certificates in the name of Mr. Ehrnreiter January 1, 2014, to the present.
 - d. All canceled checks drawn on any account established in the name of Mr. Ehrnreiter from January 1, 2014, to the present.
 - e. All original negotiable instruments and negotiable securities in the name of Mr. Ehrnreiter from January 1, 2014, to the present.
 - f. All evidence or other memoranda of any ownership interest of Mr. Ehrnreiter in any corporation, partnership, unincorporated association or any business organized or conducted for the production of income from January 1, 2014, to the present.
 - g. All evidence or other memoranda of any income received by Mr. Ehrnreiter January 1, 2014, to the present, to include but not limited to tax returns, insurance proceeds, or repayment of loans.

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1 h. All evidence or other memoranda of any employer, or place of work or employment of
2 Mr. Ehrnreiter from January 1, 2014, to the present, including but not limited to contracts, invoices,
3 billings, vouchers or payments.

4 i. All evidence of any ownership interest of Mr. Ehrnreiter to include but not limited to,
5 bills of sale, pink slips or any other record or title, in any motor vehicle, airplane, boat, equipment or
6 machinery, from January 1, 2014, to the present.

7 j. All evidence of any debts or repayments owed by Mr. Ehrnreiter, to include but not
8 limited to, those arising from loans or judgments from January 1, 2014, to the present.

9 k. Any and all evidence or other memoranda indicating that Mr. Ehrnreiter was either a
10 plaintiff or a defendant in any lawsuit from January 1, 2014, to the present.

11 l. Any and all evidence or memoranda indicating that Mr. Ehrnreiter received any
12 judgment, award, bequest or devise in any lawsuit or other court action from January 1, 2014, to the
13 present.

14 m. Any and all evidence or memoranda indicating any ownership interest of Mr. Ehrnreiter
15 in any patent, invention, trade name, or copyright.

16 n. Any and all evidence or memoranda indicating an ownership interest of Mr. Ehrnreiter
17 in any real property or developments on real property.

18 o. Any and all evidence of the sale(s) of any real or personal property of Mr. Ehrnreiter
19 from January 1, 2014, to the present.

20 p. Any and all loan applications filled out by Mr. Ehrnreiter since January 1, 2014.

21 q. Copies of all documents evidencing the sale or transfer of any assets of Mr. Ehrnreiter
22 from January 1, 2014, to the present.

23 r. Any and all documents evidencing any federal or State tax liability of Mr. Ehrnreiter.

24 s. Original cash disbursement journals and/or check registers maintained in connection
25 with any business of Mr. Ehrnreiter from January 1, 2014, to the present.

26 t. Federal income tax returns of Mr. Ehrnreiter for the year 2014 to the present.

1 **NOTICE TO JUDGMENT DEBTOR**

2 **IF YOU FAIL TO APPEAR AT THE TIME AND PLACE SPECIFIED IN THIS**
3 **ORDER, YOU MAY BE SUBJECT TO ARREST AND PUNISHMENT FOR CONTEMPT OF**
4 **COURT AND THE COURT MAY MAKE AN ORDER REQUIRING YOU TO PAY**
5 **REASONABLE ATTORNEY'S FEES INCURRED BY THE JUDGMENT CREDITORS IN**
6 **THIS PROCEEDING.**

7 28th September
8 Dated this _____ of _____, 2016.

9 By: 
10 _____
11 UNITED STATES MAGISTRATE JUDGE

12 Submitted by:

13 **THE URBAN LAW FIRM**

14
15 By: /s/ Seth T. Floyd
16 MICHAEL A. URBAN, Nevada State Bar No. 3875
17 NATHAN R. RING, Nevada State Bar No. 12078
18 SETH T. FLOYD, Nevada State Bar No. 11959
19 *Counsel for Plaintiffs Laborers Joint Trust Funds*